

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

THOMAS BRANDON KARNES

(Enter above the full name of the plaintiff
or plaintiffs in this action.)

RECEIVED

MAY 10 2024

Wendy R Oliver, Clerk
U.S. District Court
W.D. OF TN, Jackson

vs.

PAUL THOMAS CHRISTY COMBS
AMBER GALL WIFE PAIGE ROBERTS
JUDE GHERWOOD, PAMMY LEWIS

(Enter above the full name of the defendant
or defendants in this action.)

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS UNDER 42 U.S.C., §1983

I. Previous Lawsuits

- A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to your imprisonment? Yes () No ☒
- B. If your answer to A is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit

Plaintiffs: _____

Defendants: _____

2. Court (if federal court, name the district; if state court, name the county): _____

3. Docket Number: _____

4. Name of judge to whom case was assigned: _____

5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?) _____

6. Approximate date of filing lawsuit: _____

7. Approximate date of disposition: _____

- II. Place of Present Confinement: Gibson County Correctional Complex
- A. Is there a prisoner grievance procedure in the institution? Yes ☒ No ☐
- B. Did you present the facts relating to your complaint in the state prisoner grievance procedure? Yes ☒ No ☐
- C. If your answer is Yes:
1. What steps did you take? I went through the process of Capt, Chief Deputy and then Sheriff
 2. What was the result? it resulted in the Sheriff telling me since I have started litigation "good luck".
- D. If your answer is No, explain why not: _____

III. Parties

(In item A below, place your name in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any.)

- A. Name of Plaintiff Thomas Brandon Karnes
Address 401 North College Trenton, TN 38382

(In item B below, place the full name of the defendant in the first blank, his official position in the second blank, and his and his place of employment in the third blank. Use Item C for the names, positions, and places of employment of an additional defendants.)

- B. Defendant Sheriff Paul Thomas is employed as Sheriff
at Gibson County Correctional Complex Trenton, TN.

- C. Additional Defendants: JUDY SHERWOOD (SENTENCING), SGT. AMBER GALLOWAY LT, PATTIE ROBERTS CHIEF DEPUTY, DANNY LEWIS, CAPT. CHRISTY COMBS GIBSON COUNTY TAIL. ALL EMPLOYED AT GIBSON COUNTY CORRECTIONAL COMPLEX

IV. Statement of Claim

State here as briefly as possible the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheet if necessary.

- ① JUDY SHERWOOD (SENTENCING CLERK) (NOTARY FOR TAIL) REFUSED TO NOTARIZE MY MOTIONS FOR COURT AND FOR MY LEGAL MAIL THAT I WAS FILING PRO SE JUSTICE.
- ② SGT. AMBER GALLOWAY (BOOKING SGT) - REFUSED TO PROVIDE MY GENERAL SESSIONS JUDGE HONOR SHEETS, INTERFERING WITH KIOSK MESSAGES DIRECTED TO THE SHERIFFED CHIEF DEPUTY. AND ALSO CID. → CONT ON SEPARATE PAGE
SEE ATTACHED....

V. Relief

State briefly exactly what you want the court to do for you. Make no legal arguments.

Cite no cases or statutes.

I WANT THE COURT TO MAKE THE SHERIFF MAKE THE JAIL UP TO TCA CODES. I WANT DAMAGES MADE TO ME EMOTIONALLY AND MENTALLY MADE AT A MONETARY VALUE OF \$100,000 AND A MONETARY VALUE OF \$100,000 PER THE CONVICTION OF THE JAIL AND THE FAILURE OF IT PASSING INSPECTION AND CLEANLINESS NOT TO MENTION THE LOCK ON THE JAIL THAT ARE RAISED & LOCKED ON THE OUTSIDE ALONG WITH ANY OTHER PENALTY THE JAIL ~~DOES~~ SHOULD HAVE IMPOSED ON IT.

VI. Jury Demand

I would like to have my case tried by a jury. Yes ☒ No ☐.

I (We) hereby certify under penalty of perjury that the above complaint is true to the best of our information, knowledge, and belief.

Signed this 5th day of MAY, 20 24.

Thomas Brachkan

(Signature of Plaintiff/Plaintiffs)

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SHERIFF PAUL THOMAS
GIBSON COUNTY CORRECTIONAL COMPLEX

THE LATCHES ARE WELDED ON THE OUTSIDE OF ALL DOORS IN I-POD, THEY CAN ONLY BE UNLOCKED MANUALLY FROM OUTSIDE. THIS IS A FIRE HAZARD BEING THEY CAN ONLY BE ACCESSED FROM OUTSIDE. IT PUTS THE LIVES OF 26 INMATES IN JEOPARDY IF THE FACILITY CATCHES ON FIRE. THIS FACILITY IS OCCUPYING PART OF THE "OLD JAIL" WHICH HOUSES WHERE I AM NOW "M-POD". THE WINDOWS ARE WELDED SHUT, TABLES ARE NOT STAINLESS STEEL THEY ARE PAINTED AND RUSTED OUT, NO HOT AND COLD WATER TOGETHER, NO OUTSIDE LIGHT VISIBLE, NO SKY LIGHTS, NO RED TIME, CLOGGED AIR FILTERS.

I HAVE BEEN DENIED/ IGNORED MULTIPLE ATTEMPTS TO SPEAK WITH THE SHERIFF CONCERNING THESE MATTERS. I DO NOT FEEL SAFE HERE. IT HAS AFFECTED ME MENTALLY & EMOTIONALLY. I TRUST NOBODY HERE AT THIS FACILITY.

JUDITH SHERWOOD, SENTENCING CLERK &
NOTARY PUBLIC

GIBSON COUNTY CORRECTIONAL COMPLEX

REFUSED TO PROVIDE ME NOTARY SERVICE
FOR ME FILING LEGAL MOTIONS TO JUDGE
OWENS IN GENERAL SESSIONS. ALL MY
MOTIONS INCLUDING THIS ONE I HAVE ^{NEEDED} NOTARIZED
WHILE ME FILING PRO SE. THE SHERIFF
SAID I NEEDED TO HAVE MY FAMILY HAVE
IT DONE. HE REFUS TO TAKE A NOTARY OATH
FOR THE STATE OF TN OR THE U.S.A. TO
PROVIDE THIS SERVICE. SHE DID. AND
SHE CANT REFUSE OR DISCRIMINATE AGAINST
ANYONE NEEDING THIS SERVICE. MRS. SHERWOOD
HAS BEEN NOTARIZING LEGAL MATR SINCE
2018 HERE. 12-31-2018 TO BE EXACT.

AMBER GALLOWAY, SGT.

GIBSON COUNTY CORRECTIONAL COMPLEX

REFUSED TO GET ME MY JUDGEMENT SHEET
FROM GENERAL SESSIONS COURT UNDER
JUDGE OWENS FOR 2 MONTHS. ALSO
OPENING KIOSK REQUESTS THAT SHE ISNT
AUTHORIZED TO OPEN THAT WERE UNDER
GENERAL GRIEVANCE AND CLOSING THEM
OUT WITH NO RESPONSE OR JUST CLOSING
THEM OUT.

GENERAL GRIEVANCE KIOSK REQUESTS
ARE FOR CAPTAIN CHRISTY COMBS,
CHIEF DEPUTY DANNY LEWIS AND
SHERIFF PAUL THOMAS ONLY. PER
SHERIFF PAUL THOMAS.

CHRISTY COMBS, CAPTAIN & LT. PAGE ROBERTS
GIBSON COUNTY CORRECTIONAL COMPLEX

ADVISED OF PREA TWICE. ONE TIME IN PERSON.
THE FIRST WAS ADDRESSED BY PUTTING AN
IN COMPATIBLE ON THE OTHER INMATE.
AFTER HE LEFT, I REPORTED IT BEFORE. THE
SECOND ONE WAS IGNORED, BY THE CAPTAIN
AND LT. PAGE ROBERTS. BOTH IGNORED
KIOSK MESSAGES OF ME AND MY SAFETY
BEING COMPROMISED HERE AT THIS FACILITY.
GAVE HANDWRITTEN LETTER THAT I WROTE IN
CAPTAIN COMBS OFFICE TO THE SHERIFF
SHE PROMISED SHE WOULD GIVE IT TO
HIM ABOUT A CASE INVOLVING A DEATH
TO NO AVAIL. ASKED FOR JUDGEMENT
SHEETS FOR 2 MONTHS, THAT GOT IGNORED
AS WELL BY BOTH OF THEM.

RECEIVED

APR 23 2024

Wendy R Oliver, Clerk
U.S. District Court
W.D. OF TN, Memphis

① April 20, 2024

To whom it may concern,

My name is Thomas Brandon Karnes. Inmate # 10852 at Gibson County Correctional in Trenton TN. I am writing you because I want to begin a lawsuit against the jail and several employees. I feel I have had my civil rights violated and I have been incarcerated in a jail cell that has had locks welded on the outside of the door along with electric locks. If the jail caught on fire all 26 inmates would burn alive because all locks have to be manually opened to let the inmates out from the outside of the door, not to mention the electric locks also. I have been denied no fair service for my legal motions pro se while incarcerated. I have been denied access to the courts. I have been denied access to 2 stamped envelopes and 2 sheets of paper from the facility, I've had to sell my trays for paper and envelopes to mail this. I have been denied/ignored multiple attempts to speak with the Sheriff concerning these matters.

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~~Q~~ I have been denied multiple opportunities to speak with CJP here concerning a case resulting in death that I have information on. I have had 2 PREA incidents that only one was addressed with a incompatible pet on the inmate AFTER HE LEFT! Second one ignored. It has affected me mentally and emotionally. I do not feel safe here. I trust no one that works here. I am still incarcerated here until June 30, 2024. I have gone through the appropriate chain of command regarding complaints here to no avail. As of today, April 21, 2024 everyone in the entire facility is ignoring me and my requests about anything here as a "punishment" for telling the Sheriff I was filing a lawsuit. Last response he gave me was basically screw you if you need to talk to me do it through your attorney and mine. So that's where I am requesting help from you. I am enclosing my proof of these allegations along with Kiosk requests numbers as they are how you communicate here at the jail. The

numbers I am enclosing are just a small burden of proof to my allegations against the jail, the Sheriff and the Mayor and Gibson County as a whole along with each individual listed here. The state is not allowed in the part I'm housed in as it will not pass inspection because #1 they are told it's not operational. I am housed here now in "M Pod" which is called the "old jail". We do not have both hot and cold water here. The bunk beds do not meet Code, TCA codes in the 2024 edition. They are tipped off by the inspector when he's coming, that's how they are passed every time. The tables are covered with rust. They are not stainless steel, like TCA codes say. The mayor has never inspected this jail monthly as TCA codes require since I've been incarcerated here this time since January 31, 2020. On the back of Exhibit B and Exhibit C are the TCA codes that also ~~also~~ prove that my

allegations are true and correct,
I would appreciate any and all
help in this matter, any and all
assistance with this lawsuit is
also appreciated. My address here
is as follows.

Thomas Brandon Karnes
Inmate # 10852 M-1
Gibson County Correctional
401 N. College Street
Trenton, TN 38382

Thank you for your time and
assistance in this matter.

#10852

Thomas Brandon Karnes

us	Them
4.5	9.6
6.6	15.4
9.5	21.6
3.4	26.6
8.4	32.1
12.1	
9.4	4.4
15.7	8.6
19.4	17.4
26.4	18.5
32.1	23.7
6.4	7.7
10.5	10.8
5.6	6.8
9.4	14.6
14.4	19.4
18.4	25.4